

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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Attorneys for the Debtor

In re: : **Case No.: 18-29983 (ABA)**
:
CASSANDRA L. BANKO, : **Chapter 11**
:
Debtor :
:

x

**CERTIFICATION OF CASSANDRA LYNN BANKO PURSUANT TO
SECTION 1129 OF THE BANKRUPTCY CODE**

Cassandra Lynn Banco, of full age, hereby certifies as follows in support of confirmation of her Plan of Reorganization:

1. I am the Debtor in this matter.
2. I make this Certification in support of my request that the Amended Plan of Reorganization filed by me (the "Plan") be confirmed.
3. As the Court may recall, my financial difficulties stem from certain health issues I suffered which caused me to lose my ability to work, as well as damages to my home from Hurricane Sandy.
4. Since I filed my Chapter 11 case I have stabilized my income and worked with my creditors such that I was able to file a consensual plan.

5. The Plan has been filed in good faith and in a good faith belief that it complies with all applicable provisions of title 11 in accordance with 11 U.S.C. § 1129(a)(1).

6. I have not violated any provision of the Code in the negotiation and solicitation of acceptances of the Plan, as I did not solicit acceptances until a Disclosure Statement was approved by the Court in accordance with 11 U.S.C. § 1129(a)(2).

7. The Plan has been proposed by me in good faith and not by any means forbidden by law in accordance with § 1129(a)(3).

8. Any administrative claims, other than those allowed by law, including legal fees will only be paid after court approval in accordance with § 1129(a)(4). No payment has been made by me to any party rendering services to me in connection with the case other than as approved by the Bankruptcy Court. I have made an agreement with my attorneys, McDowell Law, PC, to pay their approved fees over time and not in full on the Effective Date.

9. There are no governmental licensures or approvals required for the Plan to become effective and be substantially consummated.

10. With respect to impaired classes of claims under the Plan the class of unsecured creditors has accepted the treatment proposed by the Plan and four creditors have cast ballots of acceptance as evidenced by the Report of Plan Voting filed with the Bankruptcy Court in accordance with 11 U.S.C. § 1129(a)(7).

11. Additionally, while the secured creditors in classes one and two have not cast ballots, I have reached agreements with both of those creditors as is reflected in the Consent Order approved by the Court on August 13, 2019 and a Stipulation that is being executed this week.

12. The unsecured creditors will receive 5.95% of their Allowed Claims under the Plan.

13. Under the Plan unsecured creditors will receive more than they would in a liquidation as in a Chapter 7 liquidation it is estimated that creditors would receive \$0 and under this Plan of Reorganization they will receive \$19,200.

14. I have reviewed the projections attached to the Plan and find them to be reasonable, achievable and realistic in light of my performance in this Chapter 11 case thus far. The Plan is feasible and not likely to be followed by subsequent liquidation of my estate.

15. In particular, so that I can satisfy the concerns of SPS (holder of the claim in class one) and pay the arrears on my home mortgage over five years instead of over eight years as originally proposed, I have decided to rent my home in Margate for two or more weeks each summer to generate additional funds to pay this debt more quickly. I have rented my Margate home for a few weeks in summer in previous years (before the bankruptcy) and am confident that I can net sufficient funds to enable me comply with my commitment under the Plan.

16. As a result of the foregoing, I respectfully request that this Court enter an Order confirming my Chapter 11 Plan.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: September 5, 2019

s/Cassandra Lynn Banco
Cassandra Lynn Banco